

NAVAL REACTORS DOE DIRECTIVE IMPLEMENTATION BULLETIN NUMBER 460.1-97, REVISION 1

Consistent with the Naval Nuclear Propulsion Program (NNPP) overall concept of operations, the following provides specific implementation guidance for PACKAGING AND TRANSPORTATION SAFETY for those activities under the Director's cognizance. The guidance takes precedence over Department of Energy (DOE) Order 460.1C series PACKAGING AND TRANSPORTATION SAFETY and guidance found in other related DOE documents.

1. Paragraph 4.a.2.a.2 states that all Type B or Fissile Material packaging certificates require registration with DOE in writing, prior to use of the certificate. Naval Reactors Headquarters serves as the certifying official for Naval Reactors Type B packagings. NNPP activities shall obtain Naval Reactors Headquarters approval prior to initial use of any Type B or Fissile Material packaging under a Certificate of Compliance not issued by Naval Reactors.
2. Paragraph 4.a.2.c and 4.a.2.d discuss the process to submit an application for 1) NRC or DOT packaging certificates, or 2) new DOE or NNSA Type B or fissile material packaging. Naval Reactors Headquarters serves as the certifying official for Naval Reactors Type B packagings. Naval Reactors Headquarters will coordinate NNPP packaging and transportation safety issues with the DOE, the NRC and others, as required.
3. Paragraph 4.a.3.a sets forth requirements for an approved quality assurance program. Compliance with the NNPP Quality Assurance requirements satisfies these requirements.
4. Paragraph 4.a.3.c provides deviations that require a report to "the Headquarters Certifying Official (HCO) or NNSA Certifying Official (NNSA CO)". Under these circumstances, NNPP activities will report to Naval Reactors Headquarters.
5. Section 4.b of the Order discusses Transportation Safety Documents for on-site transfers of hazardous materials that do not comply with the Hazardous Materials Regulations (HMR).
 - a. For NNPP activities, transfers entirely within a NNPP facility where access is restricted to personnel who either work at the facility or who are escorted by personnel who work at the facility are considered to meet the definition of on-site transfers. Existing procedures and requirements for handling and transferring hazardous materials on a NNPP facility ensure the safety of personnel in the facility. Such on-site transfers are not required to be in accordance with the HMR and a separate Transportation Safety Document is considered redundant and therefore is not required.
 - b. For areas that are off-site but within the boundaries of the Federal property and accessible to the public, transportation of hazardous materials shall either be in accordance with the HMR, or actions shall be taken to restrict public access to the area during the period hazardous material is being transported.
 - c. Naval Reactors Facility (NRF) movements of hazardous materials outside NRF on the Idaho National Laboratory (INL) must comply with the HMR or the Transportation Safety Document approved by Naval Reactors Headquarters.
6. Section 3.c and 4.f of the Order discuss the procedure for gaining an exemption from the requirements of the Order or Hazardous Material Regulations. NNPP activities shall obtain Naval Reactors Headquarters approval of any such exemptions. Naval Reactors Headquarters will process the exemption with DOE or DOT as necessary.

7. Section 4.g sets forth training requirements for personnel who transport or transfer hazardous materials, substances, and wastes. The NNPP currently requires training of all such personnel. Compliance with the NNPP training requirements satisfies these requirements.
8. Section 4.h discusses use of the DOE and NNSA lessons learned program to share packaging and transportation safety successes, problems, and corrective actions. Naval Reactors Headquarters will inform other agencies of NNPP packaging and transportation safety issues, as appropriate.
9. Section 5 outlines the responsibilities of various DOE offices in regards to packaging and transportation safety. The NNPP establishes its own offices to fulfill many of the functions of these positions. Furthermore, Naval Reactors Headquarters manages all interactions between NNPP activities and outside agencies. For these reasons, Section 5 does not apply to NNPP offices or personnel.
10. Requests for waivers and exceptions to specific requirements of DOE Order 460.1C or this IB will be submitted to Naval Reactors Headquarters for review and approval.
11. Oversight and evaluation of Packaging and Transportation Safety matters under the Director's cognizance will be conducted by the Naval Reactors Field Offices with additional oversight provided by Naval Reactors Headquarters.